

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
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DIVISION TWO

2020 SEP 24 PM 2:02

STATE OF WASHINGTON

Respondent,

v.

Eddie Lamont Hogan

(your name)

Appellant.

No. 54142-4-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Eddie Lamont Hogan, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Ineffective Assistance of Counsel.

Additional Ground 2

Improper Judgment and Sentence

If there are additional grounds, a brief summary is attached to this statement.

Date: 9.19.20

Signature: Eddie Hogan

Additional Grounds

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Eddie Lamont Hogan DOC # 421123

Date: 9-19-20

No. 54142-4-11

Additional Grounds 1

Ineffective Assistance of Counsel :

The defense counsel errors mostly of omission of effective representation due to a heavy case load: 8 felony charges - Murder in the first degree, Robbery in the first degree (x2), Burglary in the first degree (x2), Kidnapping in the first degree, Assault in the second degree, Unlawful Possession of a Firearm in the first degree. I believe that Conflict of Interest applies here due to me, Eddie Lamont Hogan, trying to remove Dino Sepe, my trial defense attorney because of the lack of communication between him and I. I also wanted Dino Sepe to discontinue working on my case due to a racist comment he made during one of our attorney/client visits. I wrote a letter to the judge explaining everything and that I would like a new defense attorney but I was denied that opportunity based on the judge's opinion that she has known Dino Sepe for years and she thinks he would not say any racist comment. I wrote the letter to the judge before trial started so it wasn't at last minute. I was forced to go to trial with Dino Sepe when there was an obvious conflict of interest between us. Before trial started Dino Sepe said we would most likely lose and there was nothing he could do. On the first day of trial Dino S. told me he had no tactic or plan to make an argument to win my case at trial. It was a clear lack of participation in the adversarial process.

In this case, I, Eddie Lamont Hogan, had a higher percentage of losing my case and being convicted due to Conflict of Interest, Ineffective Assistance of Counsel, my Additional Grounds #1. I, Eddie Lamont Hogan, would like to request a New trial based on the issue presented.

Additional Grounds 2

Improper Judgment and Sentence:

During Sentencing I was sentenced under the wrong offender point score. This Judgment and Sentence is incorrect because it is my first time being an adult offender. I don't think I should have 9 offender points on my first adult charge. I only have 5 juvenile charges, 4 misdemeanor charges which are a half point each, and 1 juvenile felony which is 1 point. So in total I would only have 3 offender points. One of my charges was sentenced and scored under 9 points, one of my charges was scored under 0 points, three of my charges were scored under 11 points, and one charge was scored under 6 offender points. All of my adult charges should have been scored under the same point range which would be 3 offender points because I have no prior adult cases or charges. For this reason, I, Eddie Lamont Hogan, would like to ask for a Resentencing to correct my Judgment and Sentencing.

Date: 9.19.20

x Eddie Hogan